

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FEIN, SUCH, KAHN & SHEPARD, P.C.

Counsellors at Law

7 Century Drive - Suite 201

Parsippany, New Jersey 07054

(973) 538-9300

Attorneys for Secured Creditor

U.S. BANK TRUST, N.A., AS TRUSTEE FOR

LSF10 MASTER PARTICIPATION TRUST by

CALIBER HOME LOANS, INC., AS ITS

ATTORNEY IN FACT

JILL A. MANZO, ESQ.

VER913

bankruptcy@feinsuch.com

In Re:

UNIT ARAT

Debtor(s).

Case No.: 19-20673

Adv. No.:

Chapter: 13

Hearing Date:

Judge: Honorable Vincent F.
Papalia

**OBJECTION OF CALIBER HOME LOANS,
INC. TO DEBTOR'S APPLICATION TO
EXTEND LOSS MITIGATION**

I, JILL A. MANZO, ESQ. , do hereby certify as follows:

1. I am an attorney at law of the State of New Jersey associated with the law firm of FEIN, SUCH, KAHN & SHEPARD, PC, attorneys for **CALIBER HOME LOANS, INC.**, ("Secured Creditor" herein), and I am fully familiar with the facts and circumstances of the within matter.

2. Secured Creditor holds a mortgage on Debtor's residence which is located at 175 WEST 2ND STREET, CLIFTON NJ 07011. As of the date of the bankruptcy filing, Debtor was in default on the

terms of the Note and Mortgage. Total arrears due to Secured Creditor through the plan are \$64,008.43 and total claim due at the time of filing was \$408,175.72. Secured Creditor intends to file a Proof of Claim with the Court.

3. Debtor filed the instant case on May 28, 2019.

4. Debtor filed for Loss Mitigation on January 14, 2020. An Order was subsequently entered on February 14, 2020 providing for an original termination date of May 12, 2020. Debtor filed the instant request for an extension of Loss Mitigation to which Secured Creditor respectfully objects for the reasons which follow:

(a) The Debtor has been in the Court's Loss Mitigation program since February 14, 2020 and has not been actively participating in the Program. To date, the Debtor has not activated the DMM Portal nor has the Debtor submitted any documents to Secured Creditor. Therefore, Secured Creditor respectfully requests the Court deny the Debtor's request for an extension of Loss Mitigation as the Debtor has failed to uphold their obligations under the Court's Loss Mitigation Program.

5. For the reasons stated above, and for any others that the Court deems fit to adopt, Secured Creditor respectfully objects to Debtor's plan and confirmation thereof.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

FEIN, SUCH, KAHN & SHEPARD, PC.

Attorneys for the Secured
Creditor, U.S. BANK TRUST, N.A., AS
TRUSTEE FOR LSF10 MASTER
PARTICIPATION TRUST by CALIBER HOME
LOANS, INC., AS ITS ATTORNEY IN
FACT

By: /S/JILL A. MANZO, ESQ.

DATED: May 12, 2020

cc: DAVID G. BESLOW, ESQ. - DEBTOR(S)' ATTORNEY
MARIE-ANN GREENBERG, ESQ. - TRUSTEE

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TRUST By CALIBER HOME LOANS,
INC., AS ITS ATTORNEY IN FACT
JILL A. MANZO, ESQ.
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bankruptcy@feinsuch.com

In Re:

UMIT ARAT

Debtor(s).

Case No.: 19-20673

Chapter: 13

Adv. No.:

Hearing Date: N/A

Judge: Honorable Vincent F.
Papalia

CERTIFICATION OF SERVICE

1. I, Tracy Wilkins:

☐ represent the _____ in this matter.

☒ am the secretary/paralegal for FEIN, SUCH, KAHN & SHEPARD, P.C.,
who represents the Secured Creditor, U.S. BANK TRUST, N.A., AS
TRUSTEE FOR LSF10 MASTER PARTICIPATION TRUST in this matter.

☐ am the _____ in the above case and am
representing myself.

2. On May 12, 2020, This office caused to be mailed a copy of the
following pleadings and/or documents to the parties listed in the
chart below:

a. Objection to Debtor's Request for Extension of Loss Mitigation

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
DAVID G. BESLOW GOLDMAN & BESLOW, LLC 7 GLENWOOD AVENUE SUITE 311B EAST ORANGE, NJ 07017	Debtor(s)' Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)
MARIE-ANN GREENBERG CHAPTER 13 STANDING TRUSTEE 30 TWO BRIDGES RD SUITE 330 FAIRFIELD, NJ 07004	Trustee in Bankruptcy	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)
U.S. TRUSTEE US DEPT OF JUSTICE OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100 NEWARK, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)
UMIT ARAT 175 W 2 ND ST CLIFTON, NJ 07011	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: May 12, 2020

/s/ Tracy Wilkins

Legal Assistant